



October 18, 1999

Ms. Magalie Roman Salas, Secretary  
Federal Communications Commission  
The Portals, TW-A325  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: Ex Parte Notification – WT Docket No. 99-168

Dear Ms. Salas:

This letter is being filed on behalf of Motorola, Inc. (Motorola). On October 18, 1999, Rich Barth, Leigh Chinitz and Jeanine Poltronieri of Motorola met with Bryan Tramont, Legal Advisor to Commissioner Furchtgott-Roth to discuss the *Notice of Proposed RuleMaking* in the above-referenced proceeding.

Motorola provided a plan demonstrating that active management of the 746-806 MHz band can substantially improve the efficient use of that spectrum and help satisfy the requirements of a wide range of users. Under Motorola's plan, the majority of the 36 MHz would be available for commercial services. A portion of the spectrum would, however, be made available, through auction, to private services. Motorola's proposal would allow private radio services to use the 1.5 MHz of spectrum at each edge of commercial bands. This results in a total of 6 MHz available for PMRS. This spectrum would be auctioned, and band managers would be allowed to bid, but use would be limited to private radio services.

Motorola's plan for the 746-806 MHz band provides the greatest benefit to the public by maximizing efficient use of the spectrum and minimizing the amount of spectrum used as guard-band to protect adjacent services. Both commercial mobile service providers and the private radio community have demonstrated the need for additional spectrum. Through active management of the spectrum the Commission can maximize its value to both these groups. Motorola indicated its willingness to continue to work with Commission staff to develop service rules for this spectrum that would maximize its potential use.

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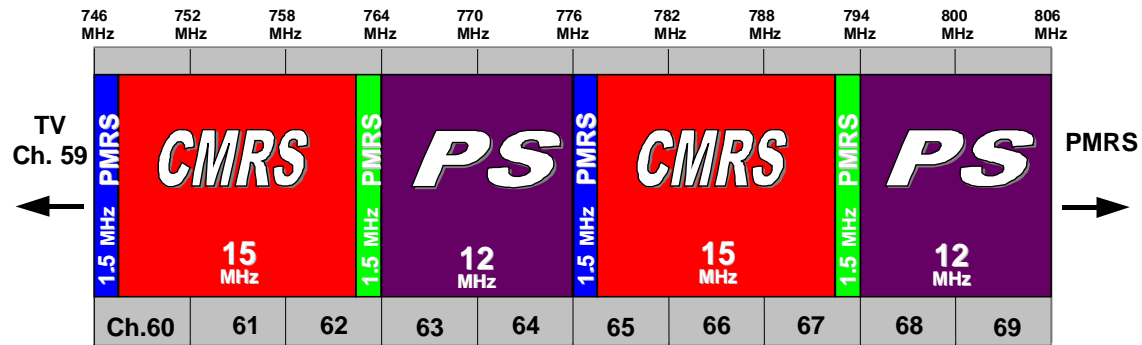
Attached to this letter are the slides used at this meeting. Please contact Jeanine Poltronieri at (202) 371-6896 regarding any questions concerning this matter.

Respectfully Submitted,

Jeanine Poltronieri  
Motorola, Inc.

Attachment  
cc:  
Bryan Tramont

# Band Plan



- 6 MHz allocated for private auctioned (PMRS), in two blocks of 1.5 + 1.5 MHz with band managers
- 30 MHz for Commercial Carriers (CMRS); 15+15 MHz.
- 24 MHz for public safety (allocation completed)

# Motorola Band Plan

- Plan taking into consideration requirements of cellular/PCS, PMRS and Public safety
- Cellular/PCS have demonstrated need for additional spectrum to accommodate new services.
- PMRS have demonstrated need for additional spectrum to satisfy requirements not served by CMRS

# Private Mobile Spectrum

- 6 MHz dedicated to PMRS
- Auctioned to Band Managers for distribution to private operators
- One nationwide license
  - 762.5-764.0 paired with 792.5-794.0 MHz
- One regional license
  - 52 Major Economic Areas
  - 746.0-747.5 paired with 776.0-777.5 MHz
- No spectrum cap

# Band Manager

- Obtains spectrum through auction
- Redistributes and manages use of spectrum for eligible PMRS users
- Cannot offer communications service, but can charge fee for access to spectrum
- Manages spectrum to maximize efficiency and minimize interference

# Need to Protect Public Safety

- Experience at 800 MHz has shown that mix of adjacent frequency high height and low height systems creates interference problems “near”, in close proximity, to an interfering site and “far” from desired site(s)
  - Mixed “high level” and “low level” systems

# Spectrum Compatibility

- Cellular Type Systems can cause Interference with Conventional usage
  - Classic Near-Far Problem
    - Interference Zone around Multi-transmitter Sites
    - Strong Interference Signal and Medium to Weak Desired Signal
  - Frequent Changes to Frequency Plan to increase Capacity
  - Average Power kept high to provide portable in-building coverage